

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 16-23200 CMB
TAMMY L. KOVAL,)	
)	Chapter 13
)	
Debtor.)	
)	
TAMMY L. KOVAL,)	Docket No. 78
)	Related to Docket No. 35, 50
)	
Movant,)	
)	
)	Hearing Date & Time:
)	
vs.)	
)	
TOYOTA FINANCIAL SERVICES ,ET.)	
AL. AND RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE,)	
)	
Respondents.)	

**NOTICE OF PROPOSED MODIFICATION OF CONFIRMED PLAN DATED
January 5, 2017**

1. Pursuant to U.S.C. §1329, the Debtor has filed an Amended Chapter 13 Plan dated February 3, 2021, which is annexed hereto as Exhibit "A" (the Amended Chapter 13 Plan). Pursuant to the Amended Chapter 13 Plan, the Debtor seeks to modify the confirmed Plan in the following particulars:

Toyota Financial Services had a remaining balance upon the expiration of its' lease. In accordance with its' proof of claim the particular amount has been inserted into the Plan. The percentage paid to unsecured creditors has been reduced in accordance with the secured claims that has been filed., which still satisfies the liquidation alternative test.

2. The proposed modification to the confirmed plan will impact the treatment of the claims of the following creditors, and in the following particulars:

Toyota Financial Services will be paid on its' lease the amount that the Debtor incurred upon the expiration of the lease. The poll of unsecured creditors is being reduced by \$1,500.82.

3. Debtor submits that the reason for the modification is as follows:

The additional claim of Toyota Financial Services is being inserted into the Plan.

4. The Debtor submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor further submits that the proposed modification complies with 11 U.S.C. #1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor respectfully requests that the Court enter an order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 3rd day of February, 2021.

/s/ Rodney D. Shepherd
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